



U.S. Department of Justice

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July 30, 2025

VIA PACER

Hon. Elizabeth A. Wolford
Chief United States District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, New York 14614

Re: ***United States of America v. Gogolack, et al.,***
Case Number: 23-CR-99-EAW

Dear Chief Judge Wolford:

On July 25, 2025, the government filed a letter documenting the pending motions in this matter. *See* Ltr., ECF No. 513, (dated July 25, 2025). The government offers this letter to (1) supplement its list of pending motions and (2) withdraw its objection to Messrs. Gerace, Ermin, and Hinkle's Motion for Change of Vicinage. *See* Gerace Non-Disp. Mots., at 103–12, ECF No. 410, (dated Apr. 16, 2025).

First, please be advised that there are two additional motions pending in this matter that are not reflected in the government's July 25th letter:

1. Mr. Knight's Motion to Produce and Review Probation Files, ECF No. 517, (dated July 28, 2025); and
2. Mr. Gerace's Motion to Produce and Review Probation Files, ECF No. 507, (dated July 24, 2025).

Second, considering this matter's administrative transfer to this Court, which is based in Rochester, New York, and the trial's anticipated duration of 3 months, the government withdraws its opposition to Messrs. Gerace, Ermin, and Hinkle's Motion for Change of Vicinage.

Respectfully,

Casey L. Chalbeck
Assistant United States Attorney

CC: Counsel of record.